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12 *Attorneys for Plaintiff*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA – NORTHERN DIVISION**

15 THE CINCINNATI SPECIALTY
16 UNDERWRITERS INSURANCE COMPANY

17 CASE NO.: 3:20-cv-00272-MMD-WGC

18 Plaintiff.

19 v.

20 RED ROCK HOUNDS, a Domestic Nonprofit
21 Cooperative Corporation Without Stock (81);
22 LYNN LLOYD, individually; AND TRACY
23 TURNBOW (Interested Party)

24 **STIPULATION AND ORDER TO
25 EXTEND TIME FOR PLAINTIFF THE
26 CINCINNATI SPECIALTY
27 UNDERWRITERS INSURANCE
28 COMPANY TO FILE AN AMENDED
29 COMPLAINT PURSUANT TO COURT
30 ORDER (ECF No. 55)**

31 Defendants.

32 RED ROCK HOUNDS, a Domestic Nonprofit
33 Cooperative Corporation Without Stock; and
34 BARBARA LYNN LLOYD,

35 Counterclaimants,

36 v.

37 THE CINCINNATI SPECIALTY
38 UNDERWRITERS INSURANCE COMPANY;
39 BEEHIVE INSURANCE AGENCY, INC., a
40 Utah corporation,

41 Counterdefendants.

42 **[THIRD REQUEST]**

43 BEEHIVE INSURANCE AGENCY, INC.

44 Third-Party Plaintiffs

45 v.

46 MOORE CLEMENS & CO., INC., a Virginia
47 Corporation, and DOES I-X, inclusive

48 Third-Party Defendants.

1 AMERICAN RELIABLE INSURANCE
2 COMPANY

3 Intervenor

4 Plaintiff/Counterdefendant, THE CINCINNATI SPECIALTY UNDERWRITERS
5 INSURANCE COMPANY, by and through its attorneys of record, the law firm of LITCHFIELD
6 CAVO LLP, Defendants/Counterclaimants RED ROCK HOUNDS, by and through its attorneys of
7 record, the law firm of Maupin Cox & LeGoy, Counterdefendant/Third-Party Plaintiff, BEEHIVE
8 INSURANCE dba CERTIFIED INSURANCE SERVICES, by and through its attorneys of record, the
9 law firm of Erickson, Thorpe & Swainston, Ltd., Third-Party Defendant MOORE CLEMENS & CO.,
10 by and through its attorneys of record, the law firm of Lewis Brisbois Bisgaard & Smith LLP, and
11 Intervener AMERICAN RELIABLE INSURANCE COMPANY, by and through its attorneys, the law
12 firm of Resnick & Louis, P.C., Defendant/Interested Party, TRACY TURNBOW, by and through her
13 attorneys of record, the law firm of Coulter Harsh Law, and BARBARA LYNN LLOYD, by and
14 through her attorneys of record, the law firm of Alling & Jillson, Ltd., (collectively “Parties”), hereby
15 jointly stipulate as follows:

16 1. Plaintiff filed this action on May 7, 2020 naming Tracy Turnbow, Red Rock Hounds,
17 and Lynn Lloyd as Defendants. (ECF No. 1)

18 2. In response to the complaint, Turnbow filed a Motion to Dismiss on July 17, 2021.
19 (ECF No. 10)

20 3. Red Rock filed a Joinder to Turnbow’s Motion to Dismiss on July 22, 2020. (ECF No.
21 14).

22 4. The Court issued an Order on January 6, 2021 granting in part and denying in part the
23 Defendants’ Motion to Dismiss. (ECF No. 55).

24 5. The Order granted Plaintiff leave to file an amended complaint. *Id.*

25 6. The Order granted Plaintiff 15 days, until January 21, 2021, to file its amended
26 complaint.

27 7. Following the Court’s order granting the Motion to Dismiss, the Parties through
28 counsel had discussions about extending the time for Plaintiff to file an amended complaint subject to

1 court approval so the parties could save fees and costs and hopefully resolve this matter and the
2 underlying matter at mediation which is currently scheduled for March 24-25 with Robert B.
3 Enzenberger.

4 8. Per Stipulation and Order [Second Request] filed April 9, 2021 (ECF No. 72), Plaintiff
5 has up and until April 23, 2021, to file its amended complaint.

6 9. The parties have agreed to extend the deadline for Plaintiff to file its Amended
7 Complaint to April 30, 2021.

8 10. Good cause exists to extend the deadline for Plaintiff to file an amended complaint as
9 the parties are engaging in productive settlement negotiations but the parties require an additional
10 week.

11 11. The parties are acting in good faith in requesting the court approve this stipulation.
12 This is Plaintiff's third request for extension.

13 **IT IS SO STIPULATED.**

14 Dated: April 21, 2021

LITCHFIELD CAVO LLP

15 By: /s/ Griffith H. Hayes, Esq.

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Attorneys for Plaintiff

21 Dated: April 21, 2021

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Rock Hounds

1 Dated: April 21, 2021

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5 *Attorneys for Defendant and Interested Party*

Tracy Turnbow

6 Dated: April 21, 2021

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11 *Attorneys for Counterdefendant and Third-Party Plaintiff Beehive Insurance Agency*

12 Dated: April 21, 2021

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18 *Attorneys for Third-Party Defendant Moore, Clemens & Co., Inc.*

19 Dated: April 21, 2021

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26 *Attorneys for Intervenor American Reliable Insurance Company*

1 Dated: April 21, 2021

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Attorneys for Defendant Barbara Lynn Lloyd

6 **ORDER**

7 Pursuant to the parties' stipulation, **IT IS SO ORDERED** that Plaintiff shall have up to and
8 until April 30, 2021 to file its amended complaint.

9
10 Dated: May 4, 2021 *nunc pro tunc*



11
12 **UNITED STATES DISTRICT COURT JUDGE**
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